

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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DEANA L. GAFFNEY	:	UNITED STATES BANKRUPTCY
	:	COURT FOR THE EASTERN DISTRICT
DYNAMIC EQUITY PARTNERS, INC.	:	OF PENNSYLVANIA
Movant	:	
vs.	:	
DEANA L. GAFFNEY	:	
Debtor	:	
WILLIAM C. MILLER	:	
Trustee	:	
	:	Case No.: 21-11024-amc
	:	

**OBJECTION OF DYNAMIC EQUITY PARTNERS, INC.  
TO CONFIRMATION OF CHAPTER 13 PLAN**

DYNAMIC EQUITY PARTNERS, INC., (hereinafter “Secured Creditor”), objects to confirmation of Debtor’s Chapter 13 Plan and assets in support of its Objection as follows:

1. The claims bar date is August 3, 2021. Secured Creditor has filed its proof of claim in the amount of \$95, 461.15 which is secured by the property located at 813 Greenhill Road, Sharon Hill, PA 19079 prior to the bar date as the loan has matured prior to bankruptcy (the “Claim”).
2. The Debtor’s proposed plan calls for payment of the Claim in accordance with the terms of the agreement between Secured Creditor and the Debtor or otherwise by agreement. No agreement has been reached between the parties and the Debtor is currently in default under the Mortgage and Note that secure the Claim.
3. Debtor has already had numerous opportunities and time to sell the Property, or let it proceed through the current foreclosure action.
4. Instead, the instant bankruptcy is another attempt by Debtor to delay Secured Creditor’s collection actions.

5. Secured Creditor has sent all necessary documentation for Sheriff Sale of the Property.
6. Secured Creditor has paid for the taxes so the Property would not go into the Judicial Sale.
7. However-to-date, Debtor has neither resolved the underlying default nor sold the Property.
8. Rather, Debtor has now filed her third bankruptcy filing to further delay Secured Creditor.
9. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
10. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, DYNAMIC EQUITY PARTNERS, INC., prays that the Court deny confirmation of the Debtor's Plan.

Law Offices of Michael Kuldiner, P.C.  
922 Bustleton Pike, 1<sup>st</sup> Floor  
Feasterville, PA 19053

Date: 08/02/2021

By: 

Adrienne N. Anderson, Esquire  
Attorney I.D. 306424

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**CERTIFICATE OF SERVICE**

I, Adrienne N. Anderson, Esquire, attorney for Secured Creditor, do hereby certify that I caused true and correct copies of the foregoing Objection of DYNAMIC EQUITY PARTNERS, INC. to Debtor's Chapter 13 Plan to be served on August 2, 2021, by first class mail, and/or electronic means upon those listed below:

Debtor(s)

Deana L. Gaffney  
533 Fern Street  
Lansdowne, PA 19050

Trustee

William C. Miller, Esquire  
P.O. Box 1229  
Philadelphia, PA 19105  
**VIA ECF**

Attorney for Debtor(s)

Zachary Perlick, Esquire  
1420 Walnut Street, Suite 718  
Philadelphia, PA 19102  
**VIA ECF**

Office of the US Trustee

United States Trustee  
Office of the U.S. Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, PA 19106

Law Offices of Michael Kuldiner, P.C.  
922 Bustleton Pike, 1<sup>st</sup> Floor  
Feasterville, PA 19053

Date: 08/02/2021

By: 

Adrienne N. Anderson, Esquire  
Attorney for Movant  
Attorney I.D. 306424  
Phone: 215-942-2100; Fax: 215-942-9664

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**ORDER**

Upon consideration of the Objection to Confirmation of the Chapter 13 Plan filed by DYNAMIC EQUITY PARTNERS, INC., it is **ORDERED and DECREED** that confirmation is **DENIED**.

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Bankruptcy Judge